

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILED

2017 OCT 26 PM 2:14

DEPUTY CLERK VLS

UNITED STATES OF AMERICA

v.

TONI FREDDY HERRERA (01)  
JUAN MARTINEZ (02)  
JESSICA OREGEL RODRIGUEZ (03)

No. 2-17-CR-11.3-D

INDICTMENT

The Grand Jury Charges:

Count One

Conspiracy to Distribute and Possess with Intent to  
Distribute 500 Grams or More of Methamphetamine  
(Violation of 21 U.S.C. § 846)

Beginning on or about a date unknown to the grand jury and continuing until on or about October 9, 2017, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Toni Freddy Herrera, Juan Martinez, and Jessica Oregel Rodriguez**, defendants, did knowingly and intentionally combine, conspire, confederate, and agree with each other and persons known and unknown to the grand jury to commit an offense against the United States, that is, to knowingly and intentionally distribute and possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii).

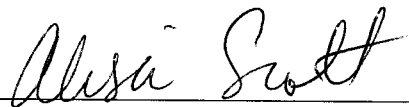
All in violation of Title 21, United States Code, Section 846.

Count Two  
Possession with Intent to Distribute  
500 Grams or More of Methamphetamine  
(Violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii))

On or about October 9, 2017, in the Amarillo Division of the Northern District of Texas, and elsewhere, **Toni Freddy Herrera, Juan Martinez, and Jessica Oregel Rodriguez**, defendants, did knowingly and intentionally possess with intent to distribute 500 grams and more of a mixture and substance containing a detectable amount of methamphetamine, a schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii), and Title 18, United States Code, Section 2.

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON

JOHN R. PARKER  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
SEAN J. TAYLOR  
Assistant United States Attorney  
Texas Bar No. 24075147  
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Amarillo, Texas 79101-2446  
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E-Mail: sean.taylor@usdoj.gov

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NORTHERN DISTRICT OF TEXAS  
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THE UNITED STATES OF AMERICA

v.

TONI FREDDY HERRERA (01)  
JUAN MARTINEZ (02)  
JESSICA OREGEL RODRIGUEZ (03)

INDICTMENT

COUNT 1: CONSPIRACY TO DISTRIBUTE AND POSSESS WITH  
INTENT TO DISTRIBUTE 500 GRAMS OR MORE OF  
METHAMPHETAMINE  
Title 21, United States Code, Section 846.

COUNT 2: POSSESSION WITH INTENT TO DISTRIBUTE 500  
GRAMS OR MORE OF METHAMPHETAMINE  
Title 21, United States Code, Sections 841(a)(1) and  
841(b)(1)(A)(viii), and 18 U.S.C. § 2.

(2 COUNTS)

A true bill rendered:

Amarillo

Alisa Scott Foreperson

Filed in open court this 26th day of October, A.D. 2017.

Clerk

DEFENDANT HERRERA IN FEDERAL CUSTODY  
DEFENDANTS MARTINEZ AND RODRIGUEZ ON BOND  
(Magistrate Case No. 2:17-MJ-100 – filed 10/10/2017)

Dee Ann Reno  
UNITED STATES MAGISTRATE JUDGE